

U.S. Department of Justice

United States Attorney Eastern District of New York

DKK/JN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

July 30, 2019

By Email and ECF

James M. Cole Michael Levy Joan M. Loughnane Sidley Austin LLP

David Bitkower Matthew S. Hellman Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-2) (AMD)

Dear Counsel:

Enclosed please find the government's fifth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. <u>See</u> ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. <u>The Government's Discovery</u>

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
2011 Report from the Government Accountability Office	Discovery Material ("DM")	DOJ_HUAWEI_B_0000005219- DOJ_HUAWEI_B_0000005233
August 17, 2009 Statement by the Embassy of the People's Republic of China in Iran	DM	DOJ_HUAWEI_B_0000005234- DOJ_HUAWEI_B_0000005235
Financial Institution Documents related to Mauritius	DM	DOJ_HUAWEI_B_0000005236- DOJ_HUAWEI_B_0000005310
Travel Records	DM	DOJ_HUAWEI_B_0000005311- DOJ_HUAWEI_B_0000005354
Statements of the Defendant on or about July 24, 2019	DM	DOJ_HUAWEI_B_0000005355- DOJ_HUAWEI_B_0000005372

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: /s/ David K. Kessler

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JAY I. BRATT

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/s/ Thea D. R. Kendler
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David Lim Trial Attorneys

Enclosures

Clerk of the Court (AMD) (by ECF) (without Enclosures) cc: